

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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In re: PAMIDRONATE PRODUCTS	:	
LIABILITY LITIGATION	:	Case No. 1:09-md-02120-KAM-SMG
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**PLAINTIFFS' MOTION TO EXTEND THE TIME TO AMEND  
THE PLEADINGS IN THIS MULTIDISTRICT LITIGATION**

Plaintiffs hereby respectfully move this Court to extend the time to amend the pleadings in this multidistrict litigation from August 20, 2010, to October 20, 2010. The additional time requested by plaintiffs is necessary to enable plaintiffs to continue their product identification efforts in these cases, i.e., their efforts to identify one or more manufacturers responsible for the pamidronate given to each plaintiff. This motion is brought on behalf of all plaintiffs in this multidistrict litigation. In support of this motion, plaintiffs rely on the accompanying Declaration of Philip J. Miller, Esq.

Counsel for plaintiffs asked counsel for defendants if defendants would consent to the motion. Defendants said they would consent but only on conditions unacceptable to plaintiffs.

Dated: August 19, 2010

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I, Daniel A. Osborn, hereby certify under penalty of perjury that on August 19, 2010, a copy of the foregoing **PLAINTIFFS' MOTION TO EXTEND THE TIME TO AMEND THE PLEADINGS IN THIS MULTIDISTRICT LITIGATION** was served on all counsel of record, including the following attorneys, by way of this Court's electronic case filing system:

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